

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address ZEV SHECHTMAN (BAR NO. 266280) Zev.Shechtman@saul.com CAROL CHOW (BAR NO. 169299) carol.chow@saul.com TURNER N. FALK (Admitted pro hac vice) turner.falk@saul.com SAUL EWING LLP 1888 Century Park East, Suite 1500 Los Angeles, California 90067 Telephone: (310) 255-6100 Facsimile: (310) 255-6200 <input type="checkbox"/> Movant(s) appearing without an attorney <input checked="" type="checkbox"/> Attorney for Movant(s)	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: SEATON INVESTMENTS, LLC, <i>et al.</i> , Debtor(s).	CASE NO.: 2:24-bk-12079-VZ CHAPTER: 11
	DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION LBR 9013-1(o)(3)
	[No Hearing Required]

1. I am the ☐ Movant(s) or ☒ attorney for Movant(s) or ☐ employed by attorney for Movant(s).
2. On (date): April 5, 2024 Movant(s) filed a motion or application (Motion) entitled: Application of Individual Debtors and Debtors-In-Possession to Employ Saul Ewing LLP as General Bankruptcy Counsel
3. A copy of the Motion and notice of motion is attached to this declaration.
4. On (date): April 5, 2024 Movant(s), served a copy of ☐ the notice of motion or ☒ the Motion and notice of motion on required parties using the method(s) identified on the Proof of Service of the notice of motion.
5. Pursuant to LBR 9013-1(o), the notice of motion provides that the deadline to file and serve a written response and request for a hearing is 14 days after the date of service of the notice of motion, plus 3 additional days if served by mail, or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F).
6. More than 18 days have passed after Movant(s) served the notice of motion.
7. I checked the docket for this bankruptcy case and/or adversary proceeding, and no response and request for hearing was timely filed.
8. No response and request for hearing was timely served on Movant(s) via Notice of Electronic Filing, or at the street address, email address, or facsimile number specified in the notice of motion.

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

9. Based on the foregoing, and pursuant to LBR 9013-1(o), a hearing is not required.

Movant(s) requests that the court grant the motion and enter an order without a hearing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 24,
Date: 2024

/s/ Turner N. Falk

Signature

Turner N. Falk

Printed name

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1888 Century Park East, Suite 1500, Los Angeles, California 90067.

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION THAT NO PARTY REQUESTED A HEARING ON MOTION (LBR 9013-1(o)(3))** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) April 24, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (*date*) April 24, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 24, 2024

Date

Turner N. Falk

Printed Name

/s/ Turner Falk

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)

Tanya Behnam on behalf of Creditor Korth Direct Mortgage Inc.
tbehnam@polsinelli.com,
tanyabehnam@gmail.com;ccripe@polsinelli.com;ladoocketing@polsinelli.com

Michael G Fletcher on behalf of Creditor Archway Real Estate Income Fund I SPE I, LLC
mfletcher@frandzel.com, sking@frandzel.com

Kelly L Morrison on behalf of U.S. Trustee United States Trustee (LA)
kelly.l.morrison@usdoj.gov

Bruce D Poltrock on behalf of Creditor Archway Real Estate Income Fund I SPE I, LLC
bpoltrock@frandzel.com, achase@frandzel.com

Zev Shechtman on behalf of Debtors Alan Gomperts, Daniel Halevy, Susan Halevy
Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;easter.santamaria@saul.com

Turner N. Falk on behalf of Debtors Alan Gomperts, Daniel Halevy, Susan Halevy
turner.falk@saul.com

Derrick Talerico on behalf of Debtors Seaton Investment, LLC, Colyton Investments, LLC,
Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC
dtalerico@wztslaw.com, maraki@wztslaw.com, sfritz@wztslaw.com

United States Trustee (LA)
ustpreion16.la.ecf@usdoj.gov

Gerrick Warrington on behalf of Creditor Archway Real Estate Income Fund I SPE I, LLC
gwarrington@frandzel.com, achase@frandzel.com

Jennifer C Wong on behalf of Interested Party Courtesy NEF
bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

Todd S Garan on behalf of Interested Party Courtesy NEF
ch11ecf@aldridgepite.com, TSG@ecf.inforuptcy.com, tgaran@aldridgepite.com

Jacqueline L James for Creditor Harvest Small Business Finance, LLC
jjames@hrhlaw.com

2. SERVED BY U.S. MAIL

Los Angeles County Treasurer/Tax Collector
Attn Bankruptcy Unit
PO Box 54110
Los Angeles Ca 90054-0110

US Small Business Administration
14925 Kingsport Rd
Fort Worth, TX 76155-2243

US Small Business Administration
409 3rd St SW
Washington, DC 20416-0005

U S Small Business Administration
312 N Spring St 5th Floor
Los Angeles Ca 90012-2678

CA Dept of Tax and Fee Admin
Account Info Group MIC29
PO Box 942879
Sacramento, CA 94279-0029

Employment Development Dept
Bankruptcy Group MIC 92E
PO Box 826880
Sacramento, CA 94280-0001

Franchise Tax Board
Bankruptcy Section MS A-340
PO Box 2952
Sacramento, CA 95812-2952

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

802 Mateo Street LLC
Attn Daniel Halevy
802 Mateo St
Los Angeles, CA 90021-1712

Alta Fire Pro
PO Box 7007
Mission Hills, CA 91346-7007

Balboa Capital Corporation
575 Anton Blvd 12th Floor
Costa Mesa Ca 92626-7685

California Refrigeration & Supply
1926 Glendon Ave Apt 4
Los Angeles, CA 90025-4661

Deborah Feldman Esq
12466 Marsh Pointe Rd
Sarasota, FL 34238-2115

Deborah Feldman Esq
24611 Mulholland Hwy
Calabasas, CA 91302-2325

Los Angeles Dept of Water and Power
PO Box 30808
Los Angeles, CA 90030-0808

Mark Berkowitz CPA
5850 Canoga Ave, Suite 220
Woodland Hills, CA 91367-6505

Mordechai Miky Acoca
1926 Glendon Ave #4
Los Angeles, CA 90025-4661

RG Fire Inc
8721 Laurel Canyon Blvd
Sun Valley, CA 91352-2919

Sienna Rose Inc
433 Colyton St
Los Angeles, CA 90013-2210

Simply Electrical
14101 S Budlong Ave
Gardena, CA 90247-2231

Southern California Edison Company
2244 Walnut Grove Avenue
PO Box 800
Rosemead, CA 91770

Southern California Gas
Centralized Correspondence
PO Box 1626
Monterey Park, CA 91754-8626

Urban Lime
915 Mateo St
Los Angeles, CA 90021-1784

American Express
PO Box 001
Los Angeles, CA 90096-0001

Silver Jeans
Attn Robert Silver
433 Colyton St Stes 201-203
Los Angeles, CA 90013-2210

Riverside County Tax Collector
PO Box 12005
Riverside, CA 92502-2205

Seapiper Inn Inc
264 S Oakhurst Dr
Beverly Hills, CA 90212-3504

Joshua Mogin Esq
Thompson Coburn LLP
10100 Santa Monica Blvd Ste 500
Los Angeles, CA 90067-4121

American Express
PO Box 981535
El Paso, TX 79998-1535

Athas Capital Group Inc
3990 Westerly Place Ste 240
Newport Beach, CA 92660

Jose Benssoupon
2220 Bagley Ave
Los Angeles, CA 90034

Brian Boyken
133 S Palm Dr #1
Beverly Hills, CA 90212

Drexter Castillo
133 S Palm Dr #2
Beverly Hills, CA 90212

Gabrielle Chavez
133 S Palm Dr #4
Beverly Hills, CA 90212

First Foundation Bank
18101 Von Karman Ave Ste 750
Irvine, CA 92612
Attn Erica Dorsett Chief Legal Counsel

Gomperts & Halevy Family Trust
264 S Oakhurst Dr
Beverly Hills, CA 90212

Nathan Halevy
133 S Palm Dr #5
Beverly Hills, CA 90212

Halevy Family Trust
257 S Linden Dr
Beverly Hills, CA 90212

Shmuel Levy
2247 S Canfield Ave
Los Angeles, CA 90034

Perla Segla
133 S Palm Dr #4
Beverly Hills, CA 90212

Shellpoint Mortgage Servicing
A division of Newrez LLC
c/o CSC-Lawyers Incorporating Service
2710 Gateway Oaks Dr Ste 150N
Sacramento, CA 95833

Wells Fargo Auto / Wells Fargo Bank
c/o CSC-Lawyers Incorporating Service
2710 Gateway Oaks Dr Ste 150N
Sacramento, CA 95833

Adam Willmouth, Ericka Ochoa
3538 Greenfield Ave
Los Angeles, CA 90034

AIRE Ancient Baths Los Angeles LLC
88 Franklin St
New York, NY 10013

Sean Rudes and Monfrere
3891 Beverly Blvd #328
Los Angeles, CA 90048

WGW Sales Inc
555 Logan Ave
Winnipeg, MB R3A 054
CANADA

3. SERVED BY E-MAIL

1 ZEV SHECHTMAN (BAR NO. 266280)

Zev.Shechtman@saul.com

2 CAROL CHOW (BAR NO. 169299)

carol.chow@saul.com

3 SAUL EWING LLP

1888 Century Park East, Suite 1500

4 Los Angeles, California 90067

Telephone: (310) 255-6100

5 Facsimile: (310) 255-6200

6 Proposed Attorneys for Alan Gomperts, Daniel

Halevy, Susan Halevy, Debtors and Debtors in

7 Possession

8
9 **UNITED STATES BANKRUPTCY COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

11 In re:

12 SEATON INVESTMENTS, LLC, *et al.*,

13
14 Debtors and Debtors In
Possession.

15 ☐ Affects All Debtors.

16 ☐ Affects Seaton Investments, LLC

17 ☐ Affects Colyton Investments, LLC

18 ☐ Affects Broadway Avenue Investments, LLC

19 ☐ Affects SLA Investments, LLC

20 ☐ Affects Negev Investments, LLC

21 ☒ Affects Alan Gomperts

22 ☒ Affects Daniel Halevy

23 ☒ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
2:24-bk-12076-VZ

Chapter 11

**NOTICE OF APPLICATION AND
APPLICATION OF INDIVIDUAL
DEBTORS AND DEBTORS-IN-
POSSESSION TO EMPLOY SAUL
EWING LLP AS GENERAL
BANKRUPTCY COUNSEL;
STATEMENT OF
DISINTERESTEDNESS**

[No Hearing Required]

24
25 **TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE AND**
26 **INTERESTED PARTIES:**
27
28

1 **PLEASE TAKE NOTICE** that the individual debtors and debtors in possession herein, Alan
2 Gomperts, Daniel Halevy and Susan Halevy (the “**Individual Debtors**”), hereby submit their
3 application for entry of an order under 11 U.S.C. § 327(a) authorizing the Individual Debtors to
4 employ Saul Ewing LLP (“**Saul Ewing**” or the “**Firm**”) as their general bankruptcy counsel,
5 effective as of March 18, 2024 (the “**Application**”). In compliance with LBR 2014-1(b)(3), the
6 Individual Debtors hereby provide the following information regarding the Application:

7 1. Identity of professional and the purpose and scope for which it is being employed

8 The Individual Debtors seek to employ the services of general bankruptcy counsel with
9 experience in chapter 11 bankruptcies. Applicant has selected Saul Ewing as general bankruptcy
10 counsel.

11 2. Whether professional seeks compensation pursuant to 11 U.S.C. § 328 or 11 U.S.C. § 330

12 The Individual Debtors seek to employ Saul Ewing pursuant to 11 U.S.C. § 327. Saul Ewing
13 will seek approval of its compensation and reimbursement of its expenses pursuant to 11 U.S.C. §§
14 330 and 331.

15 3. Background and arrangements for compensation

16 The entity Debtors captioned above are real estate investment and development companies
17 owned and/or controlled by the Individual Debtors. Some of the senior secured debt incurred by the
18 entity Debtors is personally guaranteed by the Individual Debtors. The Individual Debtors seek to
19 employ Saul Ewing. The entity Debtors are retaining separate general bankruptcy counsel.

20 Under the terms of an agreement with the Individual Debtors’ prior counsel, Danning, Gill,
21 Israel & Krasnoff, LLP (“**Danning Gill**”), Danning Gill received a \$50,000 retainer on behalf of
22 each of the Individual Debtors to commence services plus the filing fee of \$1,738.00. Accordingly,
23 Danning Gill received \$155,214, comprised of \$150,000 retainer plus \$5,214 on account of three
24 chapter 11 filing fees. Danning Gill drew down the retainer for the pre-petition fees and costs for the
25 total sum of \$3,878.60 on or about March 15, 2024. March 15, 2024 was the last day that the lead
26 attorney, Zev Shechtman, worked at Danning Gill. On March 18, 2024, the Petition Date, Mr.
27 Shechtman commenced working at Saul Ewing. Also on the Petition Date, Saul Ewing received a
28 transfer from Danning Gill to Saul Ewing’s attorney-client trust account of \$151,355.40, comprised

1 of the \$5,214 for the three chapter 11 filing fees and the \$146,141.40 retainer balance, which equals
2 \$48,713.80 per Individual Debtor (the “**Retainer**”), which Retainer is being held in Saul Ewing’s
3 attorney-client trust account pending Court approval of this employment and authorization of
4 payment to the Firm.

5 The Retainer and filing fee was advanced by Commune Events Inc. to Danning Gill.
6 Commune Events Inc. is a nondebtor corporation belonging to Individual Debtor Daniel Halevy. The
7 Individual Debtors each now owe \$51,738 to that entity. The Individual Debtors, as among
8 themselves, intend to share equally in their professional payment obligations, since the representation
9 is joint and it would be inefficient for fees to be tracked and billed separately.

10 Saul Ewing will draw down on the Retainer in accordance with the *Guide to Applications for*
11 *Retainers, and Professionals and Insider Compensation* (“**Fee Guide**”), promulgated by the Office
12 of the United States Trustee, except that the Retainer will be maintained in the Firm’s attorney-client
13 trust account. Saul Ewing will submit a monthly Professional Fee Statement each month until the
14 retainer is exhausted.

15 Applicant proposes to compensate Saul Ewing on the following basis, except as the Court
16 may otherwise determine and direct, after appropriate notice and hearing. Saul Ewing will apply to
17 the Court under sections 330 and 331 of the Bankruptcy Code for an allowance of fees and
18 reimbursable expenses not more often than every 120 days. All applications of Saul Ewing for
19 compensation will be heard upon notice to creditors and other parties-in-interest. The present hourly
20 rates for attorneys and paralegals of the Firm are set forth in the Application. These hourly rates are
21 subject to periodic adjustments.

22 Saul Ewing will also seek reimbursement for reasonable and necessary expenses incurred,
23 which may include, among other things, travel expenses, work-related meals, telephone and facsimile
24 (outgoing only), tolls and other charges, mail and express or overnight mail charges, special or hand
25 delivery charges, document processing, photocopying, scanning and printing charges, vendor
26 charges, computerized research, transcription costs, filing fees, non-ordinary overhead expenses
27 (which shall *not* include secretarial or other overtime) and other out-of-pocket expenses incurred in
28

1 providing professional services to the Individual Debtors. Saul Ewing will charge for these expenses
2 in a manner and at rates consistent with charges made generally to its other clients.

3 The attorneys at Saul Ewing who will be principally responsible for performing the legal
4 services on behalf of the Individual Debtors are Zev Shechtman, Carol Chow and Turner Falk.
5 However, Saul Ewing has other partners, associates, and paralegals all of whom are experienced in
6 debtor/creditor matters including, among other things, the representation of debtors in bankruptcy
7 cases, as well as various other areas of law which could be relevant. Depending upon the complexity
8 and amount of legal services required in this case, other professionals at Saul Ewing may be called
9 upon to provide legal services.

10 4. Name, address and telephone number of person who will provide a copy of the Application

11 A copy of the Application is appended hereto. Copies may also be requested by contacting
12 undersigned proposed counsel for the Individual Debtors.

13 **NOTICE IS GIVEN** that pursuant to Local Bankruptcy Rules 9013-1(f), 9013-1(o), each
14 interested party opposing, joining, or responding to the application must, no later than 14 days from
15 the date of service of this Notice, file with the Clerk of the Bankruptcy Court and serve upon proposed
16 counsel for the Individual Debtors, Zev Shechtman, Saul Ewing LLP, 1888 Century Park East, Suite
17 1500 Los Angeles, California 90067, Zev.Shechtman@saul.com, and the United States Trustee, 915
18 Wilshire Blvd., Suite 1850, Los Angeles, California 90017, either: (i) a complete written statement
19 of all reasons in opposition thereto or in support or joinder thereof, declarations and copies of all
20 photographs and documentary evidence on which the responding party intends to rely, and any
21 responding memorandum of points and authorities and a request for a hearing on the Application; or
22 (ii) a written statement that the application will not be opposed.

23 Pursuant to Local Bankruptcy Rule 9013-1(o)(3), failure to timely file and serve papers may
24 be deemed by the Court to be consent to the granting or denial of the Application, as the case may
25 be.

1 DATED: April 5, 2024

SAUL EWING, LLP

3 By: /s/ Zev Shechtman

4 ZEV SHECHTMAN

5 Proposed Attorneys for Alan Gomperts, Daniel
6 Halevy and Susan Halevy, Debtors and Debtors-in-
7 Possession

8 MAILING DATE: April 5, 2024

MEMORANDUM OF POINTS AND AUTHORITIES

Debtors and debtors-in-possession Alan Gomperts, Daniel Halevy and Susan Halevy (the “**Individual Debtors**”) hereby seek entry of an order pursuant to section 327(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2014-1 of the Local Bankruptcy Rules for the Central District of California (the “**Local Rules**”) authorizing the Individual Debtors to retain and employ Saul Ewing LLP (“**Saul Ewing**”) as general bankruptcy counsel, effective as of March 18, 2024 (the “**Application**”). In support of this Application, the Individual Debtors respectfully represents as follows:

A. BANKRUPTCY BACKGROUND

On March 18 and 19, 2024 (the “**Petition Date**”), the Individual Debtors and the above-captioned non-individual debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. The debtors remain in possession of their properties and continue to operate their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Code. The above-captioned cases are jointly administered.

B. THE INDIVIDUAL DEBTORS’ PROPOSED RETENTION OF SAUL EWING AS GENERAL BANKRUPTCY COUNSEL

It is necessary for the Individual Debtors to employ general bankruptcy counsel to advise and represent them in connection with their reorganization. The professional services that Saul Ewing will render to the Individual Debtors will include, but shall not be limited to, the following:

- a. providing legal advice with respect to each Individual Debtor’s powers and duties as debtors in possession in the continued operation of their business;
- b. preparing and filing all documents to commence the case, comply with requirements of the Court and the Office of the United States Trustee (“**U.S. Trustee**”), and other administrative and legal tasks such as, but not limited to, the petition, schedules, statement of financial affairs, any necessary amendments thereto, the U.S. Trustee’s 7-day package and any other U.S. Trustee inquiries;
- c. attending the meeting creditors and initial debtor interview with the Debtors;

- d. preparing and pursuing confirmation of a plan and approval of a disclosure statement;
- e. preparing, on behalf of the Individual Debtors, necessary applications, motions, answers, orders, reports, and other legal papers;
- f. representing Debtors in contested matters and adversary proceedings (if necessary) and at hearings before this Court;
- g. assisting with the protection of property of the estates;
- h. assisting with the use, sale, or lease of property of the estate and/or cash collateral, if applicable;
- i. assisting with employment and compensation of professionals;
- j. analyzing claims and administrative expenses, and object to any if necessary;
- k. assisting with negotiating and obtaining approval of compromises;
- l. appearing in Court and protecting the interests of the Individual Debtors before the Court;
- m. providing assistance, advice and representation concerning any investigation of the assets, liabilities and financial condition of the Individual Debtors that may be required under local, state or federal law or orders of this or any other court of competent jurisdiction; and
- n. performing all other legal services that are necessary or appropriate in the representation of the Individual Debtors.

The Individual Debtors propose to retain Saul Ewing as general bankruptcy counsel, effective as of March 18, 2024. Saul Ewing has extensive experience and knowledge in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. The Individual Debtors believe that Saul Ewing's expertise and experience in practicing before the Court will enable the Firm to work in an efficient and cost-effective manner on behalf of the estate.

Saul Ewing intends to apply for compensation for professional services rendered in connection with this chapter 11 case subject to the approval of this Court and compliance with applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, the UST Guidelines and any Orders entered in this chapter 11 case concerning compensation of professionals, on an

1 hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by the
2 firm.

3 The attorneys primarily responsible for representing the Debtors, and their current standard
4 hourly rates, are:

<u>Name</u>	<u>Title</u>	<u>Hourly Rate</u>
Zev Shechtman	Partner	\$725.00
Carol Chow	Counsel	\$640.00
Turner Falk	Associate	\$430.00

5
6
7
8
9
10 The biographical information of the above mentioned attorneys is attached as Exhibit “1” to
11 the below statement of Zev Shechtman.

12 In addition, other attorneys and paralegals will be involved as necessary and appropriate to
13 represent the Individual Debtors, and Saul Ewing’s hourly rates for other attorneys and professionals
14 are as follows:
15

<u>Billing Category</u>	<u>Range</u>
Partners	\$655 - \$1,260
Special Counsel	\$585 - \$1,200
Associates	\$345 - \$620
Paraprofessionals	\$175 - \$395

16
17
18
19
20 These hourly rates are subject to periodic adjustment (typically in January or July of each
21 year) to reflect economic and other conditions. Saul Ewing will maintain detailed records of actual
22 and necessary costs and expenses incurred in connection with the legal services described above. It
23 is Saul Ewing’s policy to charge its clients for all other expenses incurred in connection with the
24 client’s case. The expenses charged to clients include, among other things, telephone and telecopier
25 toll and other charges, mail and express mail charges, special or hand delivery charges, photocopying
26 charges at the rate of \$0.10 per page, travel expenses, expenses for “working meals,” computerized
27 research, transcription costs, as well as non-ordinary overhead expenses (which shall not include
28 secretarial or other overtime in these cases). The firm will charge the Individual Debtors for these

1 expenses in a manner and at rates consistent with charges made generally to the firm's other clients,
2 subject to the Local Rules of this Court.

3 **C. PREPETITION RETAINER**

4 Under the terms of an agreement with the Individual Debtors' prior counsel, Danning, Gill,
5 Israel & Krasnoff, LLP ("**Danning Gill**"), the Individual Debtors each provided Danning Gill with
6 a \$50,000 retainer to commence services plus the filing fee of \$1,738.00. Accordingly, Danning Gill
7 received \$155,214, comprised of \$150,000 retainer plus \$5,214 on account of three chapter 11 filing
8 fees. Danning Gill drew down the retainer for the pre-petition fees and costs for the total sum of
9 \$3,878.60 on or about March 15, 2024. March 15, 2024 was the last day that the lead attorney, Zev
10 Shechtman, worked at Danning Gill. On March 18, 2024, the Petition Date, Mr. Shechtman
11 commenced working at Saul Ewing. Also on the Petition Date, Saul Ewing received a transfer from
12 Danning Gill to Saul Ewing's attorney-client trust account of \$151,355.40, comprised of the \$5,214
13 for the three chapter 11 filing fees and the \$146,141.40 retainer balance, which equals \$48,713.80
14 per Individual Debtor (the "**Retainer**"), which Retainer is being held in Saul Ewing's attorney-client
15 trust account pending Court approval of this employment and authorization of payment to the Firm.

16 The Retainer and filing fee was advanced by Commune Events Inc. to Danning Gill.
17 Commune Events Inc. is a nondebtor corporation belonging to Individual Debtor Daniel Halevy. The
18 Individual Debtors each now owe \$51,738 to that entity. The Individual Debtors, as among
19 themselves, intend to share equally in their professional payment obligations, since the representation
20 is joint and it would be inefficient for fees to be tracked and billed separately.

21 Saul Ewing will draw down on the Retainer in accordance with the *Guide to Applications for*
22 *Retainers, and Professionals and Insider Compensation* ("**Fee Guide**"), promulgated by the Office
23 of the United States Trustee, except that the Retainer will be maintained in the Firm's attorney-client
24 trust account. Saul Ewing will submit a monthly Professional Fee Statement each month until the
25 retainer is exhausted.

26 **D. DISINTERESTEDNESS OF SAUL EWING**

27 As of the date of this Application, to the best of the Individual Debtors' knowledge and after
28 consideration of the disclosures in the Statement of Disinterestedness filed concurrently herewith,

1 the Individual Debtors believe that Saul Ewing and all of its partners and associates are disinterested
2 persons as that term is defined in 11 U.S.C. § 101(14), and neither the firm nor any partners or
3 associates of the firm are connected with the Individual Debtors, its creditors, any other party in
4 interest, its attorneys and accountants, or to this estate, and has no relation to any bankruptcy judge
5 presiding in this district, the Clerk of the Court or any relation to the United States Trustee in this
6 district, or any person employed at the Court or the Office of the United States Trustee, nor does the
7 firm or its attorneys represent or hold an adverse interest with respect to the debtor, any creditor, or
8 to this estate.

9 Saul Ewing and the Individual Debtors recognize that the joint representation of three
10 individuals requires the absence of conflicts of interests and that Saul Ewing will be unable to
11 represent any of the Individual Debtors in any dispute among or between them. Given the family
12 relationship of the Individual Debtors,¹ their joint and similar interests as personal guarantors, their
13 ongoing joint business interests, and the overall efficiency of this joint representation,² the Individual
14 Debtors have decided to proceed jointly in their engagement of counsel. Further, the Individual
15 Debtors hereby reaffirm their waiver of potential conflicts between them as to the joint representation
16 by Saul Ewing and they understand that Saul Ewing cannot and will not represent any of them in a
17 dispute between any of them. Further, they are not aware of any such dispute and do not believe any
18 such dispute is likely.

27 ¹ Susan Halevy is the mother of Daniel Halevy and the mother-in-law of Alan Gomperts.

28 ² Hiring three sets of lawyers would cost substantially more and result in duplications of efforts.

1 **WHEREFORE**, the Individual Debtors request that the Court enter an order authorizing
2 them to employ Saul Ewing as their general counsel, effective as of March 18, 2024, and for such
3 other and further relief as may be determined just and proper.

4
5
6
7
8 Dated:

By:


ALAN GOMPERTS
Debtor

9
10
11 Dated:

By:

DANIEL HALEVY
Debtor

12
13
14 Dated:

By:

SUSAN HALEVY
Debtor

1 **WHEREFORE**, the Individual Debtors request that the Court enter an order authorizing
2 them to employ Saul Ewing as their general counsel, effective as of March 18, 2024, and for such
3 other and further relief as may be determined just and proper.

4
5
6
7
8 Dated:

By:

ALAN GOMPERTS
Debtor

9
10
11 Dated:

By:


DANIEL HALEVY
Debtor

12
13
14 Dated:

By:


SUSAN HALEVY
Debtor

**STATEMENT OF DISINTERESTEDNESS FOR EMPLOYMENT
OF PROFESSIONAL PERSON UNDER F.R.B.P. 2014**

1. Name, address and telephone number of the professional (“the Professional” or “the “Firm”) submitting this Statement:

Saul Ewing LLP
1888 Century Park East, Suite 1500
Los Angeles, California 90067
Telephone: 310-255-6100
Facsimile: 310-255-6200

2. The services by the Professional in this case are (specify):

See Section B of the Application.

3. The terms and source of the proposed compensation and reimbursement of the Professional are (specify):

See Section C of the Application.

4. The nature and terms of retainer (i.e., nonrefundable versus an advance against fees) held by the Professional are (specify):

See Section C of the Application.

5. The investigation of disinterestedness made by the Professional prior to submitting this Statement consisted of (specify):

We conducted a conflict check with respect to all jointly-administered Debtors, their owners and principals, and all of the creditors listed on the master mailing list to determine whether the firm has any prior attorney-client relationship or other connection thereto.

6. The following is a complete description of all of the Professional’s connections with the debtor, principals of the debtor, insiders, the debtor's creditors, any other party or parties in interest, and their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the United States Trustee (specify, attaching extra pages as necessary):

None. It is noted that this is a joint representation of three individuals who are family members. I am informed and believe that the individuals are not adverse to each other, are close relatives and are similarly situated with respect to the legal and financial issues they face. They wish to be jointly represented and have waived conflicts. Nevertheless, I am not aware of an actual conflict. Accordingly, I believe such joint representation is appropriate and that my firm and I remain disinterested.

7. The Professional is not a creditor, an equity security holder or an insider of the debtor, except as follows (specify, attaching extra pages as necessary):

None.

8. The Professional is not and was not, within 2 years before the date of the filing of the petition, a director, officer or employee of the debtor.

1 9. The Professional does not have an interest materially adverse to the interest of the estate or
2 of any class of creditors or equity security holders, by reason of any direct or indirect
3 relationship to, connection with, or interest in, the debtor, or for any other reason, except as
4 follows (specify, attaching extra pages as necessary):

5 None. See also response to paragraph 6 above.

6 10. Name, address and telephone number of the person signing this Statement on behalf of the
7 Professional and the relationship of such person to the Professional (specify):

8 Zev Shechtman
9 Saul Ewing LLP
10 1888 Century Park East, Suite 1500
11 Los Angeles, California 90067
12 Telephone: 310-255-6100
13 Facsimile: 310-255-6200
14 *Zev.Shechtman@saule.com*

15 See also biographical information of attorneys at Exhibit 1.

16 11. The Professional is not a relative or employee of the United States Trustee or a Bankruptcy
17 Judge, except as follows (specify, attaching extra pages as necessary):

18 None.

19 12. Total number of attached pages of supporting documentation:

20 6 ____

21 13. After conducting or supervising the investigation described in paragraph 5 above, I declare
22 under penalty of perjury under the laws of the United States of America, that the foregoing is
23 true and correct except that I declare that paragraphs 6 through 9 and 11 are stated on
24 information and belief.

25 Executed on April 5, 2024, at Los Angeles, California.

26 /s/ Zev Shechtman
27 Zev Shechtman
28

EXHIBIT 1

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ZEV M. SHECHTMAN**Partner**

zev.shechtman@saul.com
(310) 255-6130



Primary Office
Los Angeles



Overview

Zev Shechtman represents clients in complex business bankruptcy, restructuring and insolvency matters in and out of court. His experience includes representing debtors in regular chapter 11 and subchapter V bankruptcy reorganization cases, assisting debtors in settlement negotiations and counseling regarding insolvency concerns. Zev also represents creditors, trustees, buyers of distressed assets, equity holders and contract parties in bankruptcy.

Clients and their professional teams from a variety of industries rely on Zev's counsel regarding bankruptcy and restructuring matters. Zev's broad experience includes cases involving real estate, energy, food, health care, hospitality, e-commerce, transportation, telecommunications, retail, software, media and entertainment.

Zev's work on restructuring and insolvency matters includes representations of assignees and assignors in assignments for the benefit of creditors, as well as court-appointed fiduciaries.

Zev regularly collaborates with legal teams who need guidance on bankruptcy law in the course of their work on corporate transactions or litigation.

Zev is a member of the mediation panels for the U.S. District Court for the Central District of California and all bankruptcy courts in California. His mediation training includes completion of a 40-hour course entitled "Mediating the Litigated Case," a mediation training program at the Pepperdine University School of Law's Straus Institute for Dispute Resolution.

Services

[Bankruptcy &](#)

[Restructuring](#)

[Bankruptcy Litigation](#)

Credentials & Accolades

Degrees

- J.D., University of Southern California, Gould School of Law, 2009
- M.A., New York University, 2006
- B.A., University of California, Santa Cruz, 2003

Bar Admissions

- California

Court Admissions

- U.S. District Court for the Central District of California
- U.S. District Court for the Eastern District of California
- U.S. District Court for the Northern District of California
- U.S. District Court for the Southern District of California
- U.S. Court of Appeals for the Ninth Circuit
- U.S. Supreme Court

CAROL CHOW**Counsel**

carol.chow@saul.com
(310) 255-6108



Primary Office
Los Angeles



Overview

Carol Chow handles business and commercial litigation, as well as litigation pertaining to bankruptcies and other insolvency events. She is highly experienced in the preparation and trying of cases under the time pressures often found in complicated bankruptcy litigation.

Carol represents clients on a wide range of disputes, including breach of contract, fraud, breach of fiduciary duty, negligence, unfair business practices, and declaratory relief. She also has extensive experience litigating bankruptcy disputes, including avoidance actions, plan confirmation, claims objections, and debt recharacterization. With a bachelor's degree in mathematics and computer science, Carol brings a deep understanding of finance and technology to her cases.

Carol represents debtors, trustees and creditors across various industries, including real estate, automotive, banking, manufacturing, and entertainment. She represents clients at both the trial and appellate levels.

Services

[Bankruptcy & Restructuring](#)
[Bankruptcy Litigation](#)
[Litigation](#)

Industries

[Real Estate](#)
[Technology & Manufacturing](#)
[Entertainment, Music & the Arts](#)

Credentials & Accolades

Degrees

- J.D., Stanford University, 1993
- B.S., University of California Los Angeles, 1990

Bar Admissions

- California

Court Admissions

- U.S. Court of Appeals for the Ninth Circuit
- U.S. District Court for the Central District of California
- U.S. District Court for the Northern District of California
- U.S. District Court for the Southern District of California

TURNER N. FALK

He/His

Associateturner.falk@saul.com
(215) 972-8415**Primary Office**
Philadelphia

Overview

As a member of the firm's Bankruptcy and Restructuring Practice, Turner Falk assists debtors, creditors and committees in bankruptcy and adversary proceedings. He has experience working on Chapter 11 reorganization cases, liquidations and bankruptcy confirmations, and representing multi-district litigation mass tort class creditors.

Before Turner worked in private practice, he was a law clerk for the Honorable Eric L. Frank in the U.S. Bankruptcy Court for the Eastern District of Pennsylvania. Turner was also a law clerk for the Honorable Joseph L. Fernandes in the Family Division of the Philadelphia Court of Common Pleas, where he acted as a hearing officer adjudicating over 150 dependency hearings.

Services

[Bankruptcy &](#)[Restructuring](#)[Bankruptcy Litigation](#)

Turner is named to The Best Lawyers in America: Ones to Watch list for Bankruptcy, Creditor-Debtor Rights, Insolvency and Reorganization.

Credentials & Accolades

Degrees

- J.D., University of Pittsburgh School of Law, 2014
 - Associate Editor, Journal of Law & Commerce
- B.A. Wesleyan University, 2010

Honors & Awards

- Craig M. Perry Service Award, Philadelphia Bar Association's Young Lawyers Division, 2022
- Named to *The Best Lawyers in America*: Ones to Watch list for Bankruptcy, Creditor-Debtor Rights, Insolvency and Reorganization, 2023
- Outstanding New Volunteer Award, Philadelphia VIP, 2016

Clerkship

- Judge Eric L. Frank, U.S. Bankruptcy Court, Eastern District of Pennsylvania
- Judge Joseph L. Fernandes, Philadelphia Court of Common Pleas, Family Division

Bar Admissions

- New Jersey
- Pennsylvania

Court Admissions

- Supreme Court of New Jersey
- Supreme Court of Pennsylvania
- U.S. District Court for the District of New Jersey
- U.S. Bankruptcy Court for the District of New Jersey
- U.S. District Court for the Eastern District of Pennsylvania
- U.S. Bankruptcy Court for Eastern District of Pennsylvania
- U.S. Court of Appeals for the Third Circuit

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1888 Century Park East, Suite 1500, Los Angeles, California 90067.

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF APPLICATION AND APPLICATION OF INDIVIDUAL DEBTORS AND DEBTORS-IN-POSSESSION TO EMPLOY SAUL EWING LLP AS GENERAL BANKRUPTCY COUNSEL; STATEMENT OF DISINTERESTEDNESS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) April 5, 2024 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (*date*) April 5, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 5, 2024
Date

Catherine T. Santangelo
Printed Name

/s/ Catherine T. Santangelo
Signature

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

Tanya Behnam on behalf of Creditor Korth Direct Mortgage Inc.
tbehnam@polsinelli.com,
tanyabehnam@gmail.com;ccripe@polsinelli.com;ladoCKETING@polsinelli.com

Michael G Fletcher on behalf of Creditor Archway Real Estate Income Fund I SPE I, LLC
mfletcher@frandzel.com, sking@frandzel.com

Kelly L Morrison on behalf of U.S. Trustee United States Trustee (LA)
kelly.l.morrison@usdoj.gov

Bruce D Poltrock on behalf of Creditor Archway Real Estate Income Fund I SPE I, LLC
bpoltrock@frandzel.com, achase@frandzel.com

Zev Shechtman on behalf of Debtors Alan Gomperts, Daniel Halevy, Susan Halevy
Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;easter.santamaria@saul.com

United States Trustee (LA)
ustpreion16.la.ecf@usdoj.gov

Gerrick Warrington on behalf of Creditor Archway Real Estate Income Fund I SPE I, LLC
gwarrington@frandzel.com, achase@frandzel.com

Jennifer C Wong on behalf of Interested Party Courtesy NEF
bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

2. SERVED BY U.S. MAIL

Seaton Investments, LLC
264 S Oakhurst Dr
Beverly Hills, CA 90212-3504

Colyton Investments LLC
421 Colyton St
Los Angeles, CA 90013-2210

Broadway Ave Investments, LLC
264 S Oakhurst Dr
Beverly Hills, CA 90212-3504

SLA Investments, LLC
264 S Oakhurst Dr
Beverly Hills, CA 90212-3504

Negev Investments LLC
257 S Linden Dr
Beverly Hills, CA 90212-3705

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

- 1 Alan D Gomperts
264 S Oakhurst Dr
- 2 Beverly Hills, CA 90212-3504
- 3 Daniel Halevy
257 S Linden Dr
- 4 Beverly Hills, CA 90212-3704
- 5 Sue Halevy
257 S Linden Dr
- 6 Beverly Hills, CA 90212-3704
- 7 United States Trustee (LA)
915 Wilshire Blvd, Ste 1850
- 8 Los Angeles, CA 90017-3560
- 9 Archway Real Estate Income
Fund I SPE I LLC
- 10 10100 Santa Monica Blvd Ste 500
- 11 Los Angeles, CA 90067-4121
- 12 Archway Real Estate Income
Fund I SPE I LLC
- 13 Frandzel et al - c/o Michael Fletcher
- 14 1000 Wilshire Blvd 19th Fl
- 15 Los Angeles, CA 90017
- 16 Harvest Small Business Finance (SBA)
- 17 24422 Avenida de la Carlota Ste 400
- 18 Laguna Hills, CA 92653-3634
- 19 Harvest Small Business Finance LLC
Hemar Rousso & Heald LLP
- 20 c/o Jacqueline L James
- 21 15910 Ventura Blvd 12th Fl
- 22 Encino, CA 91436-3829
- 23 Korth Direct Mortgage Inc
- 24 135 San Lorenzo Ave Ste 600
- 25 Miami, FL 33146-1875
- 26 Korth Direct Mortgage Inc
- 27 c/o Polsinelli LLP
- 28 2049 Century Park East Ste 2900
- Los Angeles, CA 90067-3221

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

- 1 Los Angeles County Treasurer/Tax Collector
- 2 Attn Bankruptcy Unit
- 3 PO Box 54110
- 4 Los Angeles Ca 90054-0110
- 5
- 6 US Small Business Administration
- 7 14925 Kingsport Rd
- 8 Fort Worth, TX 76155-2243
- 9
- 10 US Small Business Administration
- 11 409 3rd St SW
- 12 Washington, DC 20416-0005
- 13
- 14 U S Small Business Administration
- 15 312 N Spring St 5th Floor
- 16 Los Angeles Ca 90012-2678
- 17
- 18 CA Dept of Tax and Fee Admin
- 19 Account Info Group MIC29
- 20 PO Box 942879
- 21 Sacramento, CA 94279-0029
- 22
- 23 Employment Development Dept
- 24 Bankruptcy Group MIC 92E
- 25 PO Box 826880
- 26 Sacramento, CA 94280-0001
- 27
- 28 Franchise Tax Board
- 29 Bankruptcy Section MS A-340
- 30 PO Box 2952
- 31 Sacramento, CA 95812-2952
- 32
- 33 Internal Revenue Service
- 34 PO Box 7346
- 35 Philadelphia, PA 19101-7346
- 36
- 37 802 Mateo Street LLC
- 38 Attn Daniel Halevy
- 39 802 Mateo St
- 40 Los Angeles, CA 90021-1712
- 41
- 42 Alta Fire Pro
- 43 PO Box 7007
- 44 Mission Hills, CA 91346-7007
- 45
- 46 Balboa Capital Corporation
- 47 575 Anton Blvd 12th Floor
- 48 Costa Mesa Ca 92626-7685

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

- 1 California Refrigeration & Supply
- 2 1926 Glendon Ave Apt 4
- 3 Los Angeles, CA 90025-4661
- 4
- 5 Deborah Feldman Esq
- 6 12466 Marsh Pointe Rd
- 7 Sarasota, FL 34238-2115
- 8
- 9 Deborah Feldman Esq
- 10 24611 Mulholland Hwy
- 11 Calabasas, CA 91302-2325
- 12
- 13 Los Angeles Dept of Water and Power
- 14 PO Box 30808
- 15 Los Angeles, CA 90030-0808
- 16
- 17 Mark Berkowitz CPA
- 18 5850 Canoga Ave
- 19 Woodland Hills, CA 91367-6505
- 20
- 21 Mordechai Miky Acoca
- 22 1926 Glendon Ave #4
- 23 Los Angeles, CA 90025-4661
- 24
- 25 RG Fire Inc
- 26 8721 Laurel Canyon Blvd
- 27 Sun Valley, CA 91352-2919
- 28
- 29 Sienna Rose Inc
- 30 433 Colyton St
- 31 Los Angeles, CA 90013-2210
- 32
- 33 Simply Electrical
- 34 14101 S Budlong Ave
- 35 Gardena, CA 90247-2231
- 36
- 37 Southern California Edison Company
- 38 1551 W San Bernardino Rd
- 39 Covina Ca 91722-3407
- 40
- 41 Southern California Gas
- 42 Centralized Correspondence
- 43 PO Box 1626
- 44 Monterey Park, CA 91754-8626
- 45
- 46 Urban Lime
- 47 915 Mateo St
- 48 Los Angeles, CA 90021-1784

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

1 American Express
PO Box 001
2 Los Angeles, CA 90096-0001
3
4 Silver Jeans
Attn Robert Silver
433 Colyton St Stes 201-203
5 Los Angeles, CA 90013-2210
6
7 Riverside County Tax Collector
PO Box 12005
Riverside, CA 92502-2205
8
9 Seapiper Inn Inc
264 S Oakhurst Dr
Beverly Hills, CA 90212-3504
10
11 Joshua Mogin Esq
Thompson Coburn LLP
10100 Santa Monica Blvd Ste 500
12 Los Angeles, CA 90067-4121
13
14 Daniel Halevy
8561 Horner St
Los Angeles, CA 90035
15
16 American Express
PO Box 981535
17 El Paso, TX 79998-1535
18
19 Athas Capital Group Inc
3990 Westerly Place Ste 240
Newport Beach, CA 92660
20
21 Jose Benssouson
2220 Bagley Ave
22 Los Angeles, CA 90034
23
24 Brian Boyken
133 S Palm Dr #1
Beverly Hills, CA 90212
25
26 Dexter Castillo
133 S Palm Dr #2
27 Beverly Hills, CA 90212
28
29 Gabrielle Chavez
133 S Palm Dr #4
Beverly Hills, CA 90212

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

1 First Foundation Bank
18101 Von Karman Ave Ste 750
2 Irvine, CA 92612
3 Attn Erica Dorsett Chief Legal Counsel
4 Gomperts & Halevy Family Trust
264 S Oakhurst Dr
5 Beverly Hills, CA 90212
6 Nathan Halevy
133 S Palm Dr #5
7 Beverly Hills, CA 90212
8 Halevy Family Trust
9 257 S Linden Dr
10 Beverly Hills, CA 90212
11 Shmuel Levy
2247 S Canfield Ave
12 Los Angeles, CA 90034
13 Perla Segla
133 S Palm Dr #4
14 Beverly Hills, CA 90212
15 Shellpoint Mortgage Servicing
16 A division of Newrez LLC
c/o CSC-Lawyers Incorporating Service
17 2710 Gateway Oaks Dr Ste 150N
18 Sacramento, CA 95833
19 Wells Fargo Auto / Wells Fargo Bank
c/o CSC-Lawyers Incorporating Service
20 2710 Gateway Oaks Dr Ste 150N
21 Sacramento, CA 95833
22 Adam Willmouth, Ericka Ochoa
3538 Greenfield Ave
23 Los Angeles, CA 90034

24
25
26
27
28